

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

EDGARDO C. SANCHEZ-SOSA,

GUELVIN BENITEZ-
CARRASQUILLO,

GELLITZA ORTIZ-MARTINEZ,
Defendants.

CRIMINAL NO. 19-647 (RAM)

INFORMATIVE MOTION
Re: Status of the Case

TO THE HONORABLE RAUL M. ARIAS-MARXUACH
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO

The defendants, represented by the undersigned attorneys, very respectfully state and request as follows:

1. On September 28th, 2020, the Court issued an order instructing defendants to file informative motions indicating the status of the case. (Document No. 114)
2. Counsels have been in communication with AUSA Camille Garcia-Jimenez to coordinate the delivery of outstanding discovery. Further, due to the COVID-19 pandemic and the emergency measures in effect, counsels have not been able to meet with their clients to discuss digital discovery and plea negotiations.
3. As such, the parties have no objection to the tolling of the Speedy Trial Act until the next status conference in the interest of justice in order to complete discovery and resume plea negotiations.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the present motion.

I HEREBY CERTIFY that on this date I electronically filed the present motion with the Clerk of Court using the CM/ECF system which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th of November of 2020.

ERIC ALEXANDER VOS
Chief Defender
District of Puerto Rico

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